



THE MACK FIRM

Mack Press
9 Pimlico Drive
Commack, NY 11725
Tel: 516-330-7213
Email: mack@mackpress.com

June 5, 2023

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White, et al. v. Samsung Electronics America, Inc., et al.*
Case No. 17-1775 (MCA)(JSA)

Dear Magistrate Judge Allen:

In accordance with Your Honor's Amended Scheduling Order of May 8, 2023, D.E. 223, the parties respectfully submit a proposed Stipulation and Order Re Electronically Stored Information, attached as Exhibit A, and a proposed Stipulation and Order Pursuant to Fed. R. Evid. 502(d), attached as Exhibit B, for the Court's consideration. The parties also submit a proposed Stipulation and Order Re Privilege Log Content and Timing, Exhibit C, and a proposed Stipulation and Order Re Expert Discovery, Exhibit D.

Thank you for your courtesies and cooperation.

Respectfully submitted,

s/ Michael R. McDonald
Michael R. McDonald
Attorney for Defendant Samsung Electronics
America, Inc

s/ Mack Press
Mack Press
Attorney for Plaintiffs

Enclosures

cc: All Counsel of Record (via ECF)